

Jessica Ortiz MoloLamken LLP 430 Park Avenue New York, NY 10022 T: 212.607.8165 F: 212.607.8161 jortiz@mololamken.com www.mololamken.com

June 2, 2021

MEMO ENDORSED

BY CM/ECF

Honorable Sidney H. Stein United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: United States v. Jose Verra Velez, No. 19-cr-00570 (SHS)

Dear Judge Stein,

I represent Mr. Velez in the above-captioned matter. Mr. Velez respectfully asks the Court to modify his bail conditions so that he can attend a short event at his daughter's school on Thursday, June 3.¹ Neither the government nor pretrial services objects to this request.

As the Court is aware, Mr. Velez is currently out on bail. His ten-year-old daughter is finishing fourth grade, and her class is hosting a heritage celebration day at which the children will be presenting on their families' backgrounds. Parents are invited to attend.

Due to safety precautions, the event will take place outdoors, and children will be socially distanced and present sequentially. Mr. Velez's presence at the event would only be limited to his daughter's slot, which is currently scheduled for between 10:20 AM and 10:40 AM. To allow time for travel and potential delays and schedule adjustments, however, Mr. Velez respectfully asks that the Court modify his bail conditions so that he can plan to be at the school between 9:00 AM and noon on Thursday June, 3.

Thank you for your consideration of this matter.

Respectfully,

/s/ Jessica Ortiz

Jessica Ortiz

cc: All counsel of record via CM/ECF

The John Y. Dater School is located at 35 School Street, Ramsey, NJ, 07446. Mr. Velez is currently on home confinement in Ramsey, NJ.

Defendant's request to modify his bail conditions as set forth above is granted.

Dated: New York, New York June 2, 2021

SIDNEY H. STEIN U.S.D.J.